

GAO

Report to the Chairman, Subcommittee
on the District of Columbia, Committee
on Government Reform and Oversight,
House of Representatives

October 1998

DISTRICT OF COLUMBIA

Extent to Which Schools Receive Available Federal Education Grants





**United States
General Accounting Office
Washington, D.C. 20548**

**Health, Education, and
Human Services Division**

B-280461

October 9, 1998

The Honorable Tom Davis
Chairman, Subcommittee on the District of Columbia
Committee on Government Reform and Oversight
House of Representatives

Dear Mr. Chairman:

The federal government provides funds for hundreds of education programs of which 103 are available for preschool, elementary, and secondary education (see app. I and app. II). Most of these are administered by the Department of Education, although 12 other agencies also offer such programs. The biggest of these programs, outside Education, are the school nutrition programs administered by the Department of Agriculture and the Head Start program administered by the Department of Health and Human Services.

Concern has been voiced in congressional hearings and the press about how well the District of Columbia Public Schools (DCPS) have taken advantage of available federal education dollars. To address this concern, you asked us to answer three questions. (1) What federal education grant programs are available to the District of Columbia? (2) What is the status of efforts to fully optimize the ability to apply for or receive federal education grant programs by the District of Columbia? (3) What is the process for ensuring timely application for federal education grant programs and what office is charged with ensuring the success and efficiency of this process?

To answer your questions, we interviewed officials from the District of Columbia government, DCPS, and the Department of Education—including the Office of Inspector General (OIG)—and reviewed supporting documentation, including the Catalog of Federal Domestic Assistance (CFDA).¹ We compiled the list of federal education grant programs available for preschool, elementary, and secondary education through computerized searches of the CFDA. Representatives of the federal agencies that administer the programs, DCPS, and the Office of Grants Management and Development in the District of Columbia government reviewed the list of

¹The CFDA is a governmentwide compendium of federal programs, projects, services, and activities that provide assistance or benefits to the American public. It contains information on financial and nonfinancial assistance programs administered by departments and other establishments of the federal government. Because the funds available to the District of Columbia in fiscal year 1998 came from federal 1997 and 1998 fiscal year appropriations, we used the 1997 and 1998 CFDA to compile the program list.

federal education grant programs for accuracy and completeness. They indicated which of those programs are available to DCPS. For the purpose of our review, we defined accessing federal education grant programs as efforts by any office to apply for funding for District of Columbia schools and students. We conducted our work between May and July 1998, in accordance with generally accepted government auditing standards.

Results in Brief

DCPS is eligible for 72 of the 103 fiscal year 1998 federal education grant programs available for preschool, elementary, and secondary education. In fiscal year 1998, the District of Columbia accessed 47 of the 72 federal programs available to DCPS. DCPS did not apply for the remaining 25 programs because it lacked the resources to pursue these grants, according to DCPS officials. For example, they said budgetary constraints precluded applying for grants requiring matching funds, such as Even Start-Migrant Education. They further stated that DCPS had insufficient staff to apply for some grants or to implement a grant if received, such as Bilingual Education-Professional Development.

The grant application process can vary by grant and involves several offices in DCPS and the District of Columbia government. Grant applications can originate in several DCPS offices but all go through the office of the DCPS Chief Executive Officer (CEO) prior to submission to the agencies. Grant applications for the Department of Education's TRIO programs are submitted by the Office of Postsecondary Education, Research and Assistance of the District of Columbia's Department of Human Services.² The grant applications for two educational programs administered by the Department of Justice—Gang-Free Schools and Communities program and the Juvenile Mentoring Program—are the responsibility of the Office of Grants Management and Development in the Office of the Chief Financial Officer (CFO) for the District of Columbia government.

Background

Because of DCPS' location in the nation's capital, it has a unique administrative environment. Washington, D.C., is not located in a state, so that DCPS, unlike other school districts, does not receive the oversight and assistance that states often provide. Therefore, various administrative activities required by federal grants—such as oversight and program implementation management—that are frequently divided between state

²TRIO programs fund activities to encourage and motivate youths with the potential for postsecondary education to continue in and graduate from secondary school and to successfully enter and graduate from college.

educational agencies (SEA) and local educational agencies (LEA), are divided among various offices within DCPS and the District of Columbia government.³ Furthermore, recent organizational changes in both the city and its school system—part of attempts to improve the management of both entities—have changed the administration of the schools. Frequent reorganizations of both DCPS and the District of Columbia government continue to shift responsibilities and accountability for grant application and management within each entity. Finally, DCPS has one set of responsibilities not normally assigned to a school district or state education agency: It has responsibility for federal nutrition programs, including those that are not operated in the public schools, such as the Temporary Emergency Food Assistance Program.

Before 1975, the powers of the government of the District of Columbia were severely limited and the major municipal officials were appointed by the president. With the advent of home rule in 1975, the Congress delegated certain legislative powers to the District of Columbia government and authorized the election by popular vote of a mayor and city council.⁴ Before 1975, members of the school board had been elected, and this arrangement was maintained when home rule went into effect. Under this system, DCPS reported to the mayor through the school board.

In 1995, after years of financial mismanagement and neglect had resulted in the District of Columbia's inability to provide effective and efficient services in a number of areas including education, the Congress passed legislation establishing the District of Columbia Financial Responsibility and Management Assistance Authority ("Authority").⁵ The Authority issued a report entitled "Children in Crisis: A Report on the Failure of D.C. Public Schools" in which it concluded that the deplorable record of the District of Columbia's public schools by every important educational and management measure had left the system in a state of crisis.

To help address these problems, the Authority ordered a November 1996 restructuring of the DCPS, discharged the Superintendent, redesigned the position as the Chief Executive Officer/Superintendent, and delegated the responsibility for managing the District of Columbia's schools to a newly

³LEAs are often local school districts and locally controlled, while SEAs are state agencies with oversight responsibilities for the various LEAs or school districts in a state.

⁴The District of Columbia Self-Government and Governmental Reorganization Act (P.L. 93-198) granted the District of Columbia a charter effective Jan. 2, 1975.

⁵The District of Columbia Financial Responsibility and Management Assistance Act of 1995 (P.L. 104-8). The Authority is also known as the Control Board.

installed nine-member Emergency Transitional Education Board of Trustees. However, on January 6, 1998, the U.S. Court of Appeals for the District of Columbia Circuit ruled that the delegation of powers was improper. As a result, the CEO has the responsibility of managing the schools.

Federal Education Grants

The federal government lists 103 programs in the CFDA for preschool, elementary, and secondary education for fiscal year 1998.⁶ These are operated by twelve federal agencies: the Departments of Education, Agriculture, Commerce, Defense, Health and Human Services, Interior, Justice, and Labor as well as the Corporation for National and Community Service, the Environmental Protection Agency, the National Science Foundation, and the United States Information Agency. (See app. I and app. II for a list of departments and the programs they administer.) In fiscal year 1997, these agencies administered an estimated \$36.6 billion for preschool, elementary, and secondary programs, with four agencies accounting for more than 90 percent of the funds: Education (43 percent), Agriculture (24 percent), Health and Human Services (14 percent), and Labor (13 percent).

Education funding is distributed to SEAS and LEAS in two forms: formula grants and project grants. Most education programs involve formula grants. The bulk of federal funds—such as funds distributed for the education of the disadvantaged under Title I of the Elementary and Secondary Education Act—is distributed by formula. Project grants—grants that SEAS or LEAS can apply for directly from the federal agency—constitute a much smaller part of the federal education pie. Project grants are funding, for fixed or known periods, of specific projects or the delivery of specific services or products without liability for damages for failure to perform. For example, 99 percent of the nearly \$7.7 billion budgeted for education for the disadvantaged in fiscal year 1997 was formula grants. Similarly, 94 percent of the \$4.2 billion budgeted for special education in fiscal year 1997 was distributed through formula grants. However, some funds that are distributed by the federal

⁶We have defined a program as a funding stream that has a unique number in the CFDA. SEAs and LEAs may think about subdivisions of these funding streams as separate projects; therefore, they may consider that they have more “programs” than we have enumerated.

Under the Student Loan Marketing Association Reorganization Act of 1996 (which is part of P.L. 104-208), the Authority is authorized to establish an account to receive the proceeds from privatization of certain government entities to carry out the District of Columbia School Reform Act of 1995 (which provides for the development of plans to repair and improve District of Columbia schools) or to finance public elementary and secondary school facilities construction and repair within the District of Columbia.

government to states by formula are redistributed as project grants by the states to LEAS or other local entities. Part A, State Grants for Drug and Violence Prevention Programs, of the funds distributed under the Safe and Drug Free Schools Act of 1994 is one example.

Most federal education grant dollars for preschool, elementary, and secondary programs are targeted to at-risk students, including those who are poor or disabled or who have limited English proficiency. The number of poor students is determined by the number of children who apply and qualify for free and reduced-price lunches under the National School Lunch Program. Because more than 80 percent of the District of Columbia's students qualify for free or reduced-price lunches, the District of Columbia is qualified for most federal education grants.

In addition to federal program grant funds that DCPS receives directly, DCPS receives federal funds indirectly through the federal contribution to the District of Columbia budget. The District of Columbia budget and any funds budgeted for DCPS are subject to congressional approval under the District of Columbia Financial Responsibility and Management Assistance Authority Act because of the fiscal role the federal government plays in the District of Columbia budget. For example, in fiscal year 1997, about 35 percent of the District of Columbia's revenues—\$1.6 billion—came from the federal government, through either operating grants or the federal payment.⁷

The District of Columbia's Troubled Grant History

DCPS and the District of Columbia government have a history of failure in optimizing access to educational grant funds. For example, the National Science Foundation revoked a \$13.3 million grant to DCPS in response to its fall 1996 finding that DCPS was not capable of properly implementing the grant program. A 1998 Department of Education OIG report found that DCPS does not have policies and procedures covering all aspects of grant management. A self-assessment of grant management in DCPS conducted by KPMG Peat Marwick for DCPS concluded in a January 1998 report that program managers do not adequately monitor their programs' financial activities.

⁷The federal payment compensates the District of Columbia for any unreimbursed services that it may provide the federal government, as well as revenue losses that may be attributable to the large percentage of federally owned tax-exempt property in the District of Columbia, the federally imposed limitations on the height of its buildings, and the federally imposed limitation on its authority to tax the income of nonresidents.

DCPS Eligibility for Federal Preschool Through Grade 12 Education Programs

According to the Department of Education and other responsible agencies, DCPS is eligible for 72 of 103 federal education programs targeted to preschool, elementary, and secondary education. These programs include those for at-risk students (poor, limited English proficient, migrant, and disabled), Head Start, school reform, school nutrition, and technology (see app. I). The 31 other programs are predominantly for selected populations of students, such as Native Hawaiians, who generally do not reside in the District of Columbia, or were not openly available for competition in fiscal year 1998. (See app. II.)

Status of Efforts to Optimize Federal Grants

Of the 72 education programs available to the District of Columbia, it applied for and received funds for 40 grants in fiscal year 1998.⁸ The District of Columbia applied for 7 additional programs but received rejection notices for 2; award decisions are still pending on the remaining 5 programs. DCPS did not apply for the 25 other available programs because it lacked the resources to pursue these grants, according to DCPS officials. For example, these officials said that budgetary constraints precluded applying for grants requiring matching funds, such as Even Start-Migrant Education, while, for other programs such as Bilingual Education-Professional Development, they said DCPS had insufficient staff to prepare and submit grant applications or to implement a grant if received. In addition, the director of categorical grants cited the problem of time constraints that required DCPS to set priorities on grants to apply for when deadlines caused conflicts.

Responsibility for Grant Applications

DCPS may access education program grants through applications submitted by DCPS, the District of Columbia Department of Human Services, the District of Columbia Office of Grants Management and Development, or another agency for which DCPS is a subgrantee. The CEO of DCPS signs and submits all grant applications for which DCPS is the primary grantee. The DCPS office responsible for administering the grant award prepares the grant applications for CEO signature and review. Applications for the Department of Education's TRIO programs are prepared by the Office of Postsecondary Education, Research and Assistance and are submitted through the District of Columbia's Department of Human Services. Applications for two other federal education grants—administered by the Department of Justice—are the responsibility of the Office of Grants

⁸In testimony on Aug. 26, 1998 (District of Columbia: Extent to Which Schools Receive Available Federal Education Grants, [GAO/T-HEHS-98-239](#)), we reported that the District of Columbia had applied for and received funds for 39 grants. In information provided after that hearing, however, DCPS documented that it received benefits from one additional program.

Management and Development in the Office of the CFO in the District of Columbia government.⁹ DCPS may also access federal education grants by being a subgrantee or by being part of a consortium.¹⁰

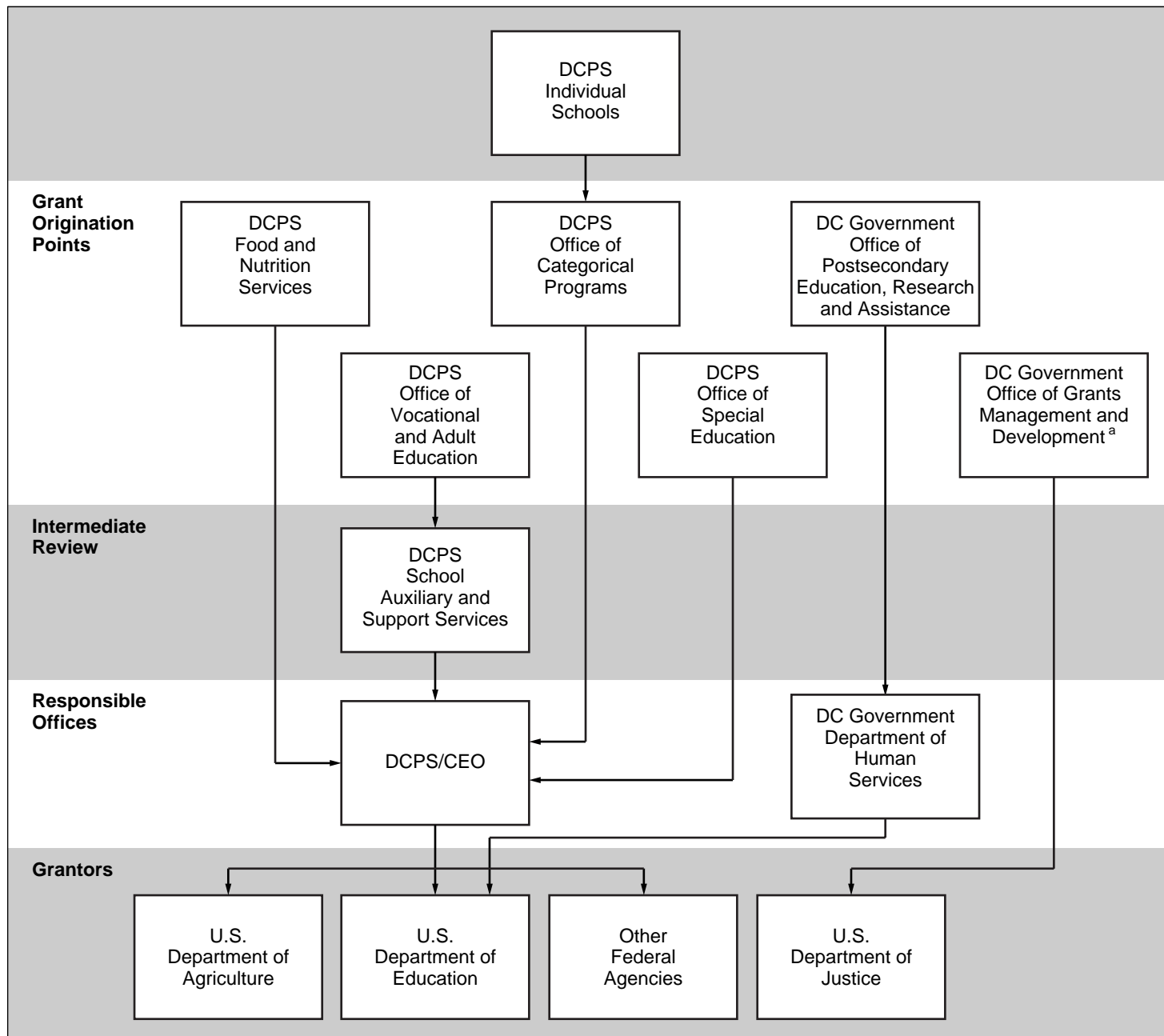
Because of ongoing reorganization in DCPS, the responsibilities for the grant application process changed during this review and will continue to change, according to DCPS officials. For example, before July 23, 1998, nutrition grant applications went directly from the Office of Food and Nutrition Programs to the Department of Agriculture; special education programs and some adult education programs and vocational education programs went directly to the CEO from the respective program offices; all other grant applications went through the Office of Categorical Programs.¹¹ During our review, the state director of food and nutrition programs was replaced and the new acting director of food and nutrition programs told us that in the future nutrition grants would be going through her office to the CEO. See figure 1.

⁹This office has also assumed responsibility for identifying all federal grant opportunities for the District of Columbia by monitoring the CFDA and Federal Register notices, according to the director. The office forwards appropriate information to the various DCPS officials, tracks due dates for applications, and sends reminders to the DCPS offices with responsibility for applications. This office also can identify and facilitate opportunities for DCPS to pursue funds as part of a consortium. This office has initiated a database to track grant applications, awards, and rejections.

¹⁰DCPS receives funds as a subgrantee to the Los Angeles Unified School District for the STAR schools program (CFDA 84.203) and as a subgrantee to the District of Columbia's Department of Employment Services for the Job Training Partnership Act (CFDA 17.250).

¹¹The director of the Office of Food and Nutrition Programs was the designated "state director" of food and nutrition programs. Department of Agriculture regulations require that funding applications be signed by the state director.

Figure 1: Responsibilities for Applying for Federal Education Grants as of July 31, 1998



^aThis office is within the Office of the Chief Financial Officer (CFO) but would submit any grant applications directly to Justice without needing the signature of the CFO.

Agency Comments

We provided a draft copy of this report to the U.S. Department of Education, District of Columbia Public Schools, and District of Columbia government for review. Department of Education officials generally agreed with our findings and provided us with technical comments on the federal grant programs listed in appendixes I and II. We incorporated these comments as appropriate.

DCPS and the District of Columbia government gave us joint comments, including an attachment with specific comments on the report and additional technical information. Their comments and our detailed response appear in appendix III. We made changes in response to this information as appropriate. Their primary concern was that the title of the report did not reflect that they had submitted applications for more than half of the grant programs available. Upon receiving additional supporting information from DCPS, we revised the title of the report. They also took issue with the way in which we counted available programs, stating that such a count should include only grants for which DCPS is the lead applicant. We disagree. From the outset of our work, we made clear that our objective was to assess the District of Columbia's overall efforts to apply for federal education grant resources, not just those for which DCPS was the lead applicant.

In addition to comments on the draft report, the DCPS CEO commented on our findings presented at an August 1998 hearing. DCPS stated at the hearing that it would have received only an additional \$5 million if it had successfully applied for all the federal grants it had not applied for (see app. I). You asked us to review the basis for this \$5 million estimate and requested that our findings be incorporated into this report. In summary, we found that the \$5 million estimate was at the low end of the potential range, which goes from about \$3.4 million to about \$21 million. Our detailed review of the estimate can be found in appendix IV.

We are sending copies of this report to the Secretary of Education, the Chief Executive Officer of DCPS, the Chief Financial Officer of the District of Columbia government, appropriate congressional committees, and others who are interested. If you wish to discuss this report, please call me

or Eleanor Johnson, Assistant Director, on (202) 512-7014. Major contributors included Gene G. Kuehneman and Benjamin F. Jordan, Jr.

Sincerely yours,

A handwritten signature in cursive script that reads "Carlotta Joyner". The signature is fluid and elegant, with the first name "Carlotta" and last name "Joyner" clearly distinguishable.

Carlotta C. Joyner
Director, Education and Employment Issues

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Figure 1: Responsibilities for Applying for Federal Education Grants as of July 31, 1998

8

Abbreviations

CEO	Chief Executive Officer
CFDA	Catalog of Federal Domestic Assistance
CFO	Chief Financial Officer
DCPS	District of Columbia Public Schools
LEA	local educational agency
OIG	Office of Inspector General
SEA	state educational agency

Federal Education Grant Programs Available to DCPS in Fiscal Year 1998

The grant programs in this appendix are ones for which District of Columbia Public Schools (DCPS) were eligible in fiscal year 1998. We have defined a federal program as a funding stream that has a unique number in the Catalog of Federal Domestic Assistance (CFDA).¹²

Counting the “number of programs” can be confusing, because there is no one definition of a program that is consistently used by federal program and budget officials or by state educational agencies (SEA) and local educational agencies (LEA). SEAs and LEAs may define as separate programs subdivisions of these funding streams, which they view as separate projects. For example, what we defined as one funding stream (CFDA 84.048)—Vocational Education-Basic Grants to States—is counted as seven separate programs on the program list maintained by Office of Categorical Grants.¹³ Therefore the DCPS count may legitimately differ from ours because we are using different definitions of “program.”

We assembled table I.1 from lists maintained by the DCPS Office of Categorical Grants, the Office of Grants Management and Development in the District of Columbia’s Office of the Chief Financial Officer (CFO), and the Department of Education and from discussions with officials in each federal agency administering preschool, elementary, and secondary education funds as well as DCPS and District of Columbia government officials.

Table I.1: The 72 Federal Education Grant Programs Available to DCPS in Fiscal Year 1998

Program	Grant type ^a	Application status ^b	CFDA number
Department of Education (N = 52)			
Adult Education—State Grant Program	Formula	R	84.002
Title I Grants to Local Educational Agencies	Formula	R	84.010
Migrant Education—Basic State Grant Program	Formula	R	84.011
Title I Program for Neglected and Delinquent Children	Formula	R	84.013
Special Education—Grants to States	Formula	R	84.027
Impact Aid	Formula	R	84.041
TRIO—Talent Search	Project	S/R ^c	84.044
(continued)			

¹²We found one other federal funding stream—Junior Reserve Officers Training Corps, financed by the Department of Defense—that is accessed by District of Columbia schools but not found in CFDA. These grants are applied for by individual schools, not DCPS. This program is not included in our analysis.

¹³VocED Title II Part A, single parents; VocED Title II, Part A, Adult Post Training; VocED Title II Sex Bias/Stereotyping; VocED Title II Criminal Offenders Program; VocED Title II State Administration; VocED Title II State Administration Sex Equity; Vocational Education-Basic Grants to States.

Appendix I
Federal Education Grant Programs
Available to DCPS in Fiscal Year 1998

Program	Grant type^a	Application status^b	CFDA number
TRIO—Upward Bound	Project	NA	84.047
Vocational Education—Basic Grants to States	Formula	R	84.048
TRIO—Educational Opportunity Centers	Project	NA	84.066
Higher Education—TRIO Staff Training Program	Project	NA	84.103
Migrant Education—Coordination Program	Project	NA	84.144
Immigrant Education	Formula	R	84.162
Magnet Schools Assistance	Project	R	84.165
Special Education—Preschool Grants	Formula	R	84.173
Special Education—Grants for Infants and Families with Disabilities	Formula	R	84.181
Safe and Drug-Free Schools and Communities—National Programs	Project	NA	84.184
Safe and Drug-Free Schools and Communities—State Grants	Formula	R	84.186
Bilingual Education Support Services	Project	R	84.194
Bilingual Education—Professional Development	Project	R	84.195
Education for Homeless Children and Youth	Formula	NA	84.196
STAR Schools	Project	R	84.203
Javits Gifted and Talented Students Education Grant	Project	NA	84.206
Even Start—State Educational Agencies	Formula	R	84.213
Even Start—Migrant Education	Project	NA	84.214
Fund for the Improvement of Education	Project	R	84.215
Capital Expenses	Formula and project	R	84.216
Tech-Prep Education	Formula and project	R	84.243
Minority Teacher Recruitment	Project	NA	84.262
Goals 2000—State and Local Education Systemic Improvement	Formula	R	84.276
School-to-Work Opportunity	Project	S/AP	84.278
Eisenhower Professional Development State Grants	Formula	R	84.281
Charter Schools	Project	R	84.282
Twenty-first Century Community Learning Centers	Project	S/R	84.287
Bilingual Education—Program Development and Implementation Grants	Project	S/AP	84.288
Bilingual Education—Comprehensive School Grants	Project	S/AP	84.290
Bilingual Education—Systemwide Improvement Grants	Project	R	84.291
Bilingual Education—Research Programs	Project	NA	84.292
Foreign Language Assistance	Project	NA	84.293
Innovative Education Program Strategies	Formula	R	84.298
Technology Innovation Challenge Grants	Project	S/AP	84.303
Goals 2000: Parental Assistance Program	Project	NA	84.310

(continued)

Appendix I
Federal Education Grant Programs
Available to DCPS in Fiscal Year 1998

Program	Grant type^a	Application status^b	CFDA number
Even Start—Statewide Family Literacy Program	Project	S/AP	84.314
Technology Literacy Challenge Fund Grants	Formula	R	84.318
Eisenhower Regional Mathematics and Science Education	Project	NA	84.319
Special Education—State Program Improvement Grants for Children with Disabilities	Project	R ^d	84.323
Special Education—Research and Innovation to Improve Services and Results for Children with Disabilities	Project	NA	84.324
Special Education—Personnel Preparation to Improve Services and Results for Children with Disabilities	Project	R ^e	84.325
Special Education—Technical Assistance and Dissemination to Improve Services and Results for Children with Disabilities	Project	NA	84.326
Special Education—Technology and Media Services for Individuals with Disabilities	Project	NA	84.327
Special Education—Studies and Evaluations	Project	NA	84.329
Advanced Placement Test Fee Payment Program	Project	NA	84.330
Department of Agriculture (N = 8)			
Food Distribution	Formula	R	10.550
School Breakfast Program	Formula	R	10.553
National School Lunch Program	Formula	R	10.555
Special Milk Program for Children	Formula	R	10.556
Child and Adult Foodcare Program	Formula	R	10.558
Summer Food Service	Formula	R	10.559
State Administrative Expenses for Child Nutrition	Formula	R	10.560
Team Nutrition Grants	Project	R	10.574
Department of Commerce (N = 1)			
Telecommunications and Information Infrastructure Assistance Program	Project	NA	11.552
Department of Justice (N = 2)			
Gang-Free Schools and Communities—Community-Based Gang Intervention	Project	NA	16.544
Juvenile Mentoring Program	Project	NA	16.726
Department of Labor (N = 2)			
Employment Services and Job Training (School to Work Opportunities)	Project	NA	17.249
Job Training Partnership Act	Formula	R	17.250
National Science Foundation (N = 1)			
Education and Human Resources ^f	Project	NA	47.076
Environmental Protection Agency (N = 1)			
Environmental Education Grants	Project	NA	66.951
United States Information Agency (N = 1)			

(continued)

Appendix I
Federal Education Grant Programs
Available to DCPS in Fiscal Year 1998

Program	Grant type^a	Application status^b	CFDA number
Teacher Exchange—New Independent States	Project	NA	82.012
Department of Health and Human Services (N = 3)			
Head Start	Formula	R	93.600
Medicaid ^g	Formula	R	93.778
Cooperative Agreements to Support Comprehensive School Health Programs to Prevent the Spread of HIV and Other Important Health Problems	Project	R	93.938
Corporation for National and Community Service (N = 1)			
Learn and Serve America—School and Community Based	Project	R	94.004

^aFormula grants are allocations of money to states or their subdivisions with a distribution formula prescribed by law or administrative regulation for activities of a continuing nature not confined to a specific project. Project grant funding for fixed or known periods is for specific projects or products without liability for damages for failure to perform. Project grants include fellowships, scholarships, research grants, training grants, traineeships, experimental and demonstration grants, evaluation grants, planning grants, technical assistance grants, survey grants, construction grants, and unsolicited contractual agreements.

^bR = received; S/AP = submitted, award pending; S/R = submitted, rejected; NA = not applied for.

^cThis application was submitted by the District of Columbia Office of Postsecondary Education, Research and Assistance.

^dDCPS receives funds under this CFDA number that were initially awarded under Secondary Education and Transitional Services for Youth with Disabilities (CFDA 84.158), which is no longer authorized because of the Individuals with Disabilities Act Amendments of 1997.

^eDCPS receives under this CFDA number funds that were initially awarded under Special Education-Personnel Development and Parent Training (CFDA 84.029), which is no longer authorized because of the Individuals with Disabilities Act Amendments of 1997.

^fDCPS was awarded this grant in fiscal year 1995; the National Science Foundation revoked the grant in fiscal year 1996.

^gDCPS officials told us that although it is not an education program, these funds reimburse DCPS for services for the disabled.

Federal Education Grant Programs Not Available to DCPS in Fiscal Year 1998

Although the grant programs in this appendix are listed in the CFDA as education programs, DCPS was not eligible to apply for them.

Table II.1: The 31 Federal Education Grant Programs Not Available to DCPS in Fiscal Year 1998

Program	Criterion ^a	CFDA number
Department of Agriculture (N = 2)		
Cooperative Extension Service	C	10.500
Agricultural Telecommunications Program	A	10.501
Department of Commerce (N = 2)		
Independent Education and Science Projects	B	11.449
Public Telecommunications Facilities	D	11.550
Department of Interior (N = 1)		
Indian Education Assistance to Schools	B	15.130
Department of Justice (N = 2)		
Desegregation of Public Education	D	16.100
Protection of Voting Rights	D	16.104
Department of Education (N = 21)		
Civil Rights Training and Advisory Services	E	84.004
International—Overseas Seminars Abroad	D	84.018
Higher Education Institutional Aid	A	84.031
Federal Work-Study Program	A	84.033
Federal Perkins Loan Cancellations	A	84.037
Impact Aid Facilities Maintenance	D	84.040
Indian Education Grants to LEAs	B	84.060
Migrant Education High School Equivalency	A	84.141
Eisenhower Professional Development—Federal Activities	E	84.168
Byrd Honors Scholarships	A	84.185
Workplace Literacy Partnerships	D	84.198
Native Hawaiian Special Education	B	84.221
Freely Associated States Education Grant	B	84.256
Even Start—Indian Tribes and Tribal Organizations	B	84.258
National Early Intervention Scholarship and Partnership	E	84.272
Telecommunications Demonstration Project	D	84.286
Bilingual Education—Program Enhancement Grants	E	84.289
Regional Technical Support and Professional Development	E	84.302
International Education Exchange	D	84.304
Even Start Family Literacy in Women's Prisons	D	84.313
State Grants for Incarcerated Youth Offenders	D	84.331

(continued)

Appendix II
Federal Education Grant Programs Not
Available to DCPS in Fiscal Year 1998

Program	Criterion^a	CFDA number
Christopher Columbus Fellowship Foundation (N = 1)		
Christopher Columbus Fellowship Program	D	85.100
Department of Health and Human Services (N = 2)		
Job Opportunities and Basic Skills Training	D	93.561
Child Care for Families at Risk of Welfare Dependency	D	93.574

^aKey to criteria for DCPS ineligibility:

A = for institutions of higher education only;

B = for specific populations who do not generally reside in the District of Columbia, such as Native Hawaiians;

C = agricultural extension program;

D = targeted for applicants other than SEAs or LEAs, such as a public or noncommercial educational broadcast station;

E = competitive grant not opened for competition for fiscal year 1998.

Comments From the District of Columbia

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Chief Financial Officer



August 13, 1998

Ms. Carlotta C. Joyner
Director, Education and
Employment Issues
U.S. General Accounting Office
Washington, D.C. 20548

Dear Ms. Joyner:

Thank you for your letters of August 5th in which you transmitted a draft report entitled "District of Columbia – Schools Receive About Half of Available Federal Education Grants." We appreciate the opportunity to comment on this report before it is submitted to the United States Congress.

Our enclosed response to the draft report includes a summary and comments on each finding. We understand that you will include our response in GAO's final report to the United States Congress.

Based on the information provided to you, we request that the title of the report be changed to accurately reflect the report's contents.

If you require more information or have any additional comments, please do not hesitate to contact Dr. Mitzi Beach, D.C. Public Schools at (202) 724-4980 and/or Mr. Norman Dong, Office of Grants Management and Development at (202) 727-6539.

Sincerely,

Arlene Ackerman
Superintendent, D.C. Public Schools

Earl C. Cabbell
Interim Chief Financial Officer

Enclosures

441 4th Street, N.W., Suite 1150N, Washington, D.C. 20001 202/727-2476 www.dccfo.com

See comment 1.

RESPONSE OF THE DISTRICT OF COLUMBIA TO THE DRAFT GENERAL ACCOUNTING OFFICE REPORT, "DISTRICT OF COLUMBIA – SCHOOLS RECEIVE ABOUT HALF OF AVAILABLE FEDERAL EDUCATION GRANTS"

See comment 2.

Summary: For FY 98, the District of Columbia Public Schools (DCPS) applied for and received 39 Federal grants totaling more than \$59,332,337. Also, DCPS applied for 10 additional grants totaling \$5,587,467 for which we are still awaiting a determination from the Federal funding agency. Combining these numbers shows that the DCPS indeed "accessed" far more than half of the Federal grants that were available. In fact, the total dollar amount of grants applied for is far greater than the amount for which DCPS did not apply.

See comment 1.
See comment 3.

See comment 4.

We believe that GAO did not properly count the grants for which DCPS is eligible to apply as the lead agency. Instead, GAO counted toward the District's eligible universe those grants which institutions of higher education could apply for in collaboration with local educational agencies and nonprofit organization. It was our understanding that this review covered only those grants for which DCPS was the eligible or lead applicant, not those for which DCPS would have been dependent on others to take the lead.

See comment 5.

See comment 6.

The title of the report does not take into account the work that DCPS has done in making strategic grant decisions, nor does it consider all the grants that DCPS would not apply for, even if eligible, because of the area of specialization of the grant. This response shows that DCPS does access a great deal more than half of the grants available to it.

See comment 7.

While your report noted that DCPS serves as both the State and local educational agency, the report did not clearly present the negative effect of inadequate staff capacity to support the dual functions.

Finding: DCPS does not have in place policies and procedures covering all aspects of grant management.

Response: It is true that DCPS does not have in place policies and procedures covering all aspects of grant management. The Office of Grants Management and Development in the Office of the Chief Financial Officer had, in the past, developed policies and procedures for governing grants management in the city. However, because of the many changes being made in the District's grant management, the manual was never issued. The Office of Grants Management is currently developing policies and procedures governing grants management for the entire District government. Current plans call for these policies and procedures to be in place on October 1, 1998.

Finding: Of the 79 education programs available to the District, DCPS applied for and received funds for 36 grants in fiscal year 1998. DCPS did not apply for the 43 other available programs because DCPS lacked the resources to pursue these grants, according to DCPS officials.

Appendix III
Comments From the District of Columbia

See comment 8.

See comment 9.

See comment 10.

See comment 11.

See comment 12.

Response: Tables A and B (attached) show the total eligible grant universe for DCPS, which differs from the GAO determination. Table A shows the total number of grants applied for and received. Table B shows the total grants applied for with action pending by the U.S. Department of Education. Table C shows the grants for which DCPS did not apply. The rationale for not applying for most of these grants has already been sent to you, but pages from the Catalog of Federal Domestic Assistance (CFDA) which describe who are eligible applicants are included with this response for CFDA numbers 84.044, 84.047, 84.066, 84.168, 84.206, and 84.302

In some cases, DCPS was an ineligible applicant, but the D.C. Office of Postsecondary Education Research and Assistance applied for the grants. In these instances, even if DCPS were an eligible applicant, once another District agency made a decision to seek the grant, DCPS would not have competed against that agency. In other instances, DCPS did not apply because the grant was specific to a certain ethnic group; for example, DCPS did not apply for Indian Education grants that require a 25% Indian enrollment because there is not a 25% Indian enrollment in DCPS.

Finding: Applications for two other federal education grants—administered by the Department of Justice—are signed and submitted by the Office of Grants Management and Development in the Office of the Chief Financial Officer.

Response: The Office of Grants Management did not submit the two referenced grants to the Department of Justice. The Office of Grants Management does serve as the State agency for many Department of Justice Grants, but has had no involvement in the named grants.

Appendix III
Comments From the District of Columbia

Attachment A

GRANTS AWARDED SY 1997-98

Name	RSC	Expiration Date	Amount of Grant Awarded
GED	1318	9/30/98	\$ 30,000
JTPA (Subgrant from DOES)	1359	12/31/98	200,000
Military Science	1555	9/30/98	1,532,994
Title VI, Innovative Ed.	4538	9/30/98	1,539,150
Title II, Eisenhower			
Professional Development	4607	9/30/98	1,284,296
Prof. Development Higher Education			244,748
Title IV, Safe & Drug Free Schools	4638	9/30/98	2,073,186
School Health Programs	4678	9/30/98	245,250
TEAMS/Project Impact	4698	9/30/98	2,000,139
Title I, Deprived Children, LEA	4710	9/30/98	21,490,393
Vocational Education (States Grants)		9/30/98	4,214,921.00
State Administration	4908		
State Program Leadership	4918		
Adult Training/Retraining	4948		
Single Parents	4958		
Sex/Gender Equity	4968		
DC Corrections/Oak Hill, Lorton	4978		
Vocational Education, LEA	4988		293,600
Impact Aid	5008	9/30/98	835,193
Tech Prep	5028	9/30/98	138,980
DC Transition Initiative	5118	7/31/98	492,065
(Carryover)	5117		326,342
Adult Education (Basic State Grant)	5208	9/30/98	1,113,775
Bilingual Education (State Grant)	5218	9/30/98	100,000
Magnet Schools Assistance	5378	9/30/98	451,256
Emergency Immigrant Ed.	5786	9/30/98	251,256
Even Start Family Literacy (Subgrant)	5848	9/30/98	477,615
DCPS Head Start	5928	7/31/98	4,464,508
Technology Literacy Challenge	6037	9/30/98	1,000,000
Prime DC	6048	9/30/98	498,791
Charter Schools	6058	9/30/98	2,063,095
Goal 2000	6348	9/30/98	1,901,747
Neglected and Delinquent	EA8B,EA8D,EA8F	9/30/98	847,337
Migrant Education	EA8G	9/30/98	307,677
Capital Expenses/Private	EA8K	9/30/98	186,124
Preschool Grants		9/30/98	222,631
Individual with Disabilities (State Grants)		9/30/98	3,508,249
Summer STARS		9/30/99	4,997,019
Total			\$ 59,332,337

Mireya C:Excel Grants 97-98/8/12/98/10:59 AM

Appendix III
Comments From the District of Columbia

Attachment B

Grants Applied For (have not received)

Grant Title	Federal #	Date	Estimated Funding
Partnership in Character Education	84.215-V		\$ 999,527
School to Work	84.278-E	5/29/98	\$ 1,800,000
Bilingual Education: Program Development and Implementation Grant			
Garrison ES	84.288S	1/20/98	17,055
Brightwood ES	84.288S	1/20/98	111,450
Roosevelt (Bilingual Ed.)	84.288S	1/20/98	174,879
Bilingual Education: Comprehensive School Grants			
Bell Multicultural	84.290U	1/26/98	56,084
Meyer ES	84.290U	1/26/98	82,770
Brightwood ES	84.290-U	1/26/98	251,882
Technology Innovation Challenge	84.303A	5/29/98	2,000,000
Even Start, Statewide Family Literacy Initiative	84.314A	6/29/98	93,820
Total			\$ 5,587,467

**Appendix III
Comments From the District of Columbia**

Attachment C

Non-Applied Grants 1997-98

Grant Title	Federal #	Projected Duration	Funding Average
Civil Rights Training & Advisory	84.004	3 year period	\$ 700,000
Special Ed. - Grant to States	84.028		
JavIt Gifted & Talented Students Ed. Grants	84.208	Per year up to 3years	200,000
National Early Intervention Scholarship Prog.	84.272	12 months up to 60	345,000
Safe & Drug Free Schools & Communities - National Programs	84.184	12 months up to 36	250,000
Bilingual Education Professional Development	84.195	5 years period	200,000
Education for Homeless Children Youth	84.196	Per year (3years period)	100,000
Bilingual Education Enhancement Grants	84.289	Annually (2 years period)	125,000
Bilingual Education Research Programs	84.292	18-24 months period	50,000
Foreign Language Assistance	84.293	3 years period	81,000
Eisenhower Regional Math & Science Ed.	84.319	3 to 5 years period	1,500,000
Special Ed. -States Prog. Improvement for Children with Disabilities	84.323		80,000
Special E. - Research & Innovation to Improve Children with Disabilities	84.023		180,000
Special Ed. Personnel Prep. To Improve Services & Result for Children with Disabilities	84.029		225,000
Special E. Tech & Media Services for Individuals with Disabilities	84.026	No estimated amount	
Special Education - Studies & Evaluations	84.159	No estimated amount	
Advanced Placement Test Fee Payment Prog.	84.330		50,000
Total			\$ 4,085,000

The following are GAO's comments on the District of Columbia's letter dated August 13, 1998.

GAO Comments

1. While our report was still in draft, the information provided by the District of Columbia indicated that it had applied for fewer than half of the available grants. After receiving a draft of the report for review and comments, the District of Columbia provided us with additional grant application and award documentation. We accordingly revised the title of the report to reflect this additional information.
2. Our count of the number of grant programs differs from that of DCPS. The 39 awards and 10 applications cited by the District of Columbia in its comments include multiple awards under the same CFDA number and the Military Science program (Junior Reserve Officers Training Corps), which is not listed in the CFDA. As we stated in our report, we defined a program as a grant program listed in the CFDA with a unique number. Accordingly, we counted multiple applications, awards, and so on for a program with the same CFDA number as one program in our report. As for the amount of the awards, since dollar amounts were outside the scope of this report, we cannot comment on the information provided. Accordingly, we cannot comment on the dollar amount of awards received or grant applications pending approval, nor did we make any changes to the report based on this information.
3. The District of Columbia states that the dollar amount of the grants applied for exceeded the amount for which DCPS did not apply. We cannot comment on whether the dollar amount of the grants applied for exceeded the dollar amount of the grants that DCPS did not apply for since dollar amounts were outside the scope of the audit work for this report.
4. From the start of our review, our definition of available or eligible grants included all grants from which DCPS could receive funds, whether it was the primary grantee or a subgrantee in collaboration with institutions of higher education, other District of Columbia departments, nonprofit organizations, other SEAS, and other LEAS. Accordingly, we considered all such grants as available to the District of Columbia and DCPS and have identified these as available in our report.
5. We disagree with DCPS' interpretation of our scope. At no time did we establish or suggest that our review would be limited to such awards for which DCPS could take the lead role in applications. DCPS currently receives

grants as part of a consortium, as part of a team, and as a subgrantee. These are listed in appendix I and DCPS' attachment A.

6. We have no comments on the work that DCPS has done in making strategic grant decisions. Such activities were outside the scope of our audit work for this report.

7. We have no comments on the negative effect of inadequate staff capacity to support the dual functions of the SEA and LEA. The adequacy of DCPS staff capacity was outside the scope of our audit work for this report.

8. Our count of the number of programs available to DCPS differs from the numbers included in attachments A, B, and C to its comments. The awards and applications listed by the District of Columbia include multiple awards under the same CFDA number and the Military Science program (Junior Reserve Officers Training Corps), which is not listed in the CFDA. In conducting our analysis, we defined a program as a grant program listed in the CFDA with a unique number. Multiple applications, awards, and so on for a program with the same CFDA number are counted as one program for our purposes. In addition, there are programs absent from DCPS' lists, such as the National School Lunch Program (CFDA 10.555), and programs that it has applied for and received funding from in the past, such as the Education and Human Resources program (CFDA 47.076). Several of the Special Education grants listed in attachment C (CFDA 84.028, 84.029, 84.023, 84.026, and 84.159) are programs that are no longer authorized because of the Individuals with Disabilities Education Act Amendments of 1997. Of these, DCPS has current awards for Special Education-Personnel Development and Parent Training CFDA 84.029 (currently received as CFDA 84.325). Attachment C does not list any of the grant programs sponsored by the Department of Justice, the Department of Labor, the Environmental Protection Agency, the National Science Foundation, and the United States Information Agency. Our list of available programs has been reviewed and approved by officials representing each of the federal agencies sponsoring these programs. These officials confirmed that all listed programs were available to DCPS.

9. We agree that the District of Columbia told us that it did not apply for the programs with CFDA numbers 84.044, 84.047, 84.066, 84.168, 84.206, and 84.302 and that it provided a variety of explanations for not applying for these grant programs. As to the eligibility for the programs cited, we relied on the federal agencies sponsoring the programs to confirm for us whether DCPS is ineligible to receive or apply for program awards. Appendix I and

appendix II reflect their judgments. Specifically, the programs with CFDA numbers 84.044, 84.047, 84.066, and 84.206 are available to DCPS and, therefore, appear in appendix I. The programs with CFDA numbers 84.168 and 84.302 are not available to DCPS and, therefore, appear in appendix II.

10. Similarly, the Department of Education has identified the TRIO grants (CFDA 84.044, 84.047, and 84.066) as programs for which DCPS is eligible.

11. We agree that several education grants are targeted to specific groups, such as Native Americans. These programs are indicated as such in appendix II.

12. We have clarified the text to agree with appendix I, which noted that the Office of Grants Management and Development had not applied for these grants.

DCPS' Estimate of Maximum Funds It Could Have Received by Applying for All Other Available Grants

On August 26, 1998, we testified before the Subcommittee on the extent to which DCPS accessed federal grants in 1998.¹⁴ At the hearing, DCPS stated that if it had successfully applied for the grants it had not applied for (see app. I), it would have received only an additional \$5 million. You asked us to review the basis for the \$5 million estimate and requested that we incorporate our findings into this report.

To that end, we provided DCPS our list of 26 grants not applied for and asked that it provide supporting information, including the estimated award amount and the source and assumptions made for each amount estimated. This list along with DCPS' estimated award amount and the source and assumptions made for each amount estimated are presented in table IV.1.¹⁵

In summary, we found that DCPS' \$5 million estimate was at the low end of the range of potential funds, which is from about \$3.4 million to more than \$21 million. Moreover, DCPS was not consistent in the criteria it appeared to use in making its estimate. Because the chance of successfully securing any grant award varies by grant, we cannot precisely calculate the amount DCPS would have received if it had applied for these grants.

¹⁴District of Columbia: Extent to Which Schools Receive Available Federal Education Grants (GAO/T-HEHS-98-239, Aug. 26, 1998).

¹⁵In the course of preparing its estimates, DCPS realized that George Washington University had applied for and received one of the grants on the list and that DCPS is benefiting from this grant. As a result, we have revised our number of grants applied for from 46 to 47, the number of grants received from 39 to 40, and the number of grants not applied for from 26 to 25 throughout the report.

Appendix IV
DCPS' Estimate of Maximum Funds It Could
Have Received by Applying for All Other
Available Grants

Table IV.1: The 25 Federal Education Grant Programs Available to DCPS and Not Applied for in Fiscal Year 1998, Based on the CFDA, June 1998

Program	Grant type^a	CFDA number	DCPS' estimated award	Assumptions for DCPS' estimated award^b	Award range, average, and other pertinent information^c
Department of Education (N=18)					
TRIO—Upward Bound	Project	84.047	Not eligible ^d (\$330,000)	Average	Range: \$197,649 to \$674,594. Average: \$330,363. Mathematics and science awards range: \$218,400 to \$293,541. Average: \$243,741.
TRIO—Educational Opportunity Centers	Project	84.066	Not eligible ^d (\$350,000)	Average	Range: \$190,000 to \$761,760. Average: \$350,000.
Higher Education—TRIO Staff Training Program	Project	84.103	Not eligible ^d (\$207,000)	Average	Range: \$90,000 to \$260,000. Average: \$207,000.
Migrant Education—Coordination Program	Project	84.144	\$30,000	Low	Range: \$30,000 to \$4,500,000. Average not applicable.
Safe and Drug-Free Schools and Communities—National Programs	Project	84.184	\$500,000	Unknown	Range and average not available.
Education for Homeless Children and Youth	Formula	84.196	\$100,000	Based on formula	Average: \$475,000. Range not available.
Javits Gifted and Talented Students Education Grant	Project	84.206	\$200,000	Unknown	Range: \$150,000 to \$250,000. Average not available.
Even Start—Migrant Education	Project	84.214	\$50,000	Unknown	Range: \$109,500 to \$270,000. Average: \$230,000.
Minority Teacher Recruitment	Project	84.262	Not eligible ^d (\$184,000)	Average	Average: \$184,000. Range not available.
Bilingual Education—Research Programs	Project	84.292	\$60,000	Unknown	Range and average not available.
Foreign Language Assistance	Project	84.293	\$52,000	Average	Average: \$52,000. Range not available.
Goals 2000: Parental Assistance Program	Project	84.310	\$350,000	Average	Range: \$50,000 to \$500,000. Average: \$350,000.
Eisenhower Regional Mathematics and Science Education	Project	84.319	\$1,500,000	Anticipated amount	Anticipated amount of each grant: \$1,500,000.

(continued)

Appendix IV
DCPS' Estimate of Maximum Funds It Could
Have Received by Applying for All Other
Available Grants

Program	Grant type^a	CFDA number	DCPS' estimated award	Assumptions for DCPS' estimated award^b	Award range, average, and other pertinent information^c
Special Education—Research and Innovation to Improve Services and Results for Children with Disabilities	Project	84.324	\$150,000	Low	Range: \$150,000 to \$300,000. Varies by competition.
Special Education—Technical Assistance and Dissemination to Improve Services and Results for Children with Disabilities	Project	84.326	\$150,000	Unknown	Range: \$500,000 to \$4,000,000. Varies by competition.
Special Education—Technology and Media Services for Individuals with Disabilities	Project	84.327	\$150,000	Low	Range: \$150,000 to \$600,000. Varies by competition.
Special Education—Studies and Evaluations	Project	84.329	\$100,000	Low	Range: \$100,000 to \$1,000,000. Average not available.
Advanced Placement Test Fee Payment Program	Project	84.330	\$5,000	Unknown	Range: \$1,000 to \$400,000. Average not available.
Department of Commerce (N = 1)					
Telecommunications and Information Infrastructure Assistance Program	Project	11.552	\$200,000	Unknown	Range: \$55,517 to \$ 652,752. Average: \$380,000
Department of Justice (N = 2)					
Gang-Free Schools and Communities—Community-Based Gang Intervention	Project	16.544	\$100,000	Unknown	Range and average not available.
Juvenile Mentoring Program	Project	16.726	\$50,000	Unknown	Range and average not available.
Department of Labor (N = 1)					
Employment Services and Job Training (School to Work Opportunities)	Project	17.249	\$100,000	Low	Range: \$100,000 to \$1,750,000. Average not available.
National Science Foundation (N = 1)					
Education and Human Resources ^e	Project	47.076	\$93,000	Average	Range: \$7,500 to \$4,000,000. Average: \$93,500.

(continued)

**Appendix IV
DCPS' Estimate of Maximum Funds It Could
Have Received by Applying for All Other
Available Grants**

Program	Grant type ^a	CFDA number	DCPS' estimated award	Assumptions for DCPS' estimated award ^b	Award range, average, and other pertinent information ^c
Environmental Protection Agency (N = 1)					
Environmental Education Grants	Project	66.951	\$5,000	Unknown	Grants are not to exceed \$250,000. Most are \$75,000 or less. Twenty-five percent of funds obligated are for grants of \$5,000 or less. Average not applicable.
United States Information Agency (N = 1)					
Teacher Exchange—New Independent States	Project	82.012	Not eligible ^f (\$15,000)	Unknown	Range and average not applicable.

^aFormula grants are allocations of money to states or their subdivisions with a distribution formula prescribed by law or administrative regulation for activities of a continuing nature not confined to a specific project. Project grant funding for fixed or known periods is for specific projects or products without liability for damages for failure to perform. Project grants include fellowships, scholarships, research grants, training grants, traineeships, experimental and demonstration grants, evaluation grants, planning grants, technical assistance grants, survey grants, construction grants, and unsolicited contractual agreements.

^bAlthough we asked DCPS to provide us with the source and assumptions that gave rise to its estimates, it provided us only with the sources. This column is our analysis based on the information in the far right column.

^cCFDA, June 1998.

^dDCPS states that it is not eligible for this grant program administered by the Department of Education. We consider DCPS to be eligible for this program based on the information and comments provided us by department officials.

^eDCPS was awarded this grant in fiscal year 1995; the National Science Foundation revoked the grant in fiscal year 1996.

^fDCPS states that it is not eligible for this United States Information Agency program. We consider DCPS to be eligible for this program given information provided by an agency official.

DCPS States That Value of Awards Not Applied for Amounts to \$5 Million

DCPS estimated that awards for the 25 grants not applied for in fiscal year 1998 totaled \$5,031,000. In all cases, DCPS identified the June 1998 CFDA as the source for estimated award amounts. However, it did not elaborate on the assumptions it made to estimate award amounts. For some grants, the CFDA publishes the lowest and highest grant sizes available as well as the average grant size. Our analysis shows that 8 DCPS award estimates are the average award (or anticipated grant amount) reported in the CFDA, 5 award estimates are the minimum award reported in the CFDA, 2 award estimates are below the minimum award amount reported in the CFDA, and 1 award is based on the statutory formula. For the remaining estimates, we could

not determine the basis for the DCPS estimate. A further implied assumption in its figures was that only one application was submitted, even when multiple applications were possible.

DCPS' Estimate Is at Low End of Potential Range

While \$5 million is within the range of possible amounts, it is on the low end of this range. DCPS had to make some assumptions concerning the amounts applied for and the number of applications submitted to estimate the amount of grant funds not applied for. DCPS implicitly assumed that it would apply for only one grant under each CFDA number, even if multiple awards were possible. For the 16 programs for which minimum and maximum grant amounts were given in the CFDA, the range of possible grants not applied for is \$3.4 million to \$21 million. Since there are 9 more programs for which the CFDA does not provide such estimates, it would be reasonable to assume that this range would be adjusted upward if the other programs could be included. This range could also be adjusted upward for multiple applications to programs with the same CFDA number.

No Precise Estimates Are Possible Using CFDA Award Information

Although we can point to 25 grants with unique numbers in the CFDA that the District of Columbia did not apply for, it is impossible to estimate precisely how much money this represents using the funding amounts listed in the CFDA. In the absence of any further supporting documentation, we have no basis upon which to evaluate the assumptions DCPS used to estimate award amounts. We can, however, take note of the information on awards available in the CFDA and the limitations inherent in basing award estimates on this information.

- The funding amounts given are estimates, not necessarily reflections of the actual amounts that are available.
- The funding information given differs for each program.
- The amount the District of Columbia would apply for under any one grant is unknown.
- The chance of any particular applicant securing a grant varies enormously.

Funding Amounts Provided Are Strictly Estimates

The dollar amounts listed in the CFDA as program obligations for the current and future fiscal years are strictly estimates. The actual dollar amounts available for grants vary depending on each program's budget and on congressional appropriations or amendments. Some programs listed as available and funded in the CFDA might have been eliminated by amendments or have had no funds appropriated. The agency responsible

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DCPS' Estimate of Maximum Funds It Could
Have Received by Applying for All Other
Available Grants

for administering a program is the best source for up-to-date information on the availability and dollar amounts of funds available. However, DCPS did not cite the agencies as sources for its information.

Funding Information
Varies

Program descriptions in the CFDA often include both a dollar range and an average of awards. These amounts are based on funds awarded in the past fiscal year and the current fiscal year to date. Some programs list total appropriation and number of awards made the previous year. Other programs give no figure but indicate that it varies by competition.

Size and Number of
Awards Are Unpredictable

Maximum, minimum, or average award amounts are not necessarily representative of what DCPS could be expected to apply for. In addition, DCPS could apply for multiple awards under the same CFDA grant number. Because the amounts applied for can vary widely even within the same program, it is difficult to speculate on the amount that DCPS would have applied for and the number of applications DCPS could have submitted. For example, DCPS submitted two applications to the Fund for the Improvement of Education for substantially different amounts—\$1 million and \$5 million. Moreover, some programs fund a variety of competitive projects within the same fiscal year. In these cases, DCPS could submit multiple applications for the same program in response to different competitions with different awards available. For example, the Teacher Enhancement program and the Instructional Materials Development program available through the National Science Foundation's Education and Human Resources grant (CFDA 47.076) both fund a variety of projects.

Chance of Securing a
Grant Varies

DCPS operates as both an SEA and an LEA. For grant competitions open to SEAS, it competes with 55 other state entities. When it competes with other LEAS, it competes with about 16,000 local entities. Other competitions—like those for Safe and Drug Free Schools—may involve even more entities, such as communities and nonprofit organizations. For many of these grants, few applicants get awards. Only seven fiscal year 1997 awards were made for the Twenty-first Century Community Learning Centers program (DCPS' application for fiscal year 1998 was rejected). However, in other cases, funding is driven by formulas and is virtually assured. DCPS has declined to apply for the formula-based McKinney Act Education for Homeless Children and Youth program that would have provided \$100,000 in fiscal year 1998. DCPS also declined to submit a noncompetitive application for funds from the Advanced Placement Test

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Fee Payment Program, which would have provided assistance to poor District of Columbia students taking the advanced placement exams.

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